

ORIGINAL

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 NEWPORT NEWS DIVISION

EXHIBIT

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5 BOBBY BLAND, DAVID RAY
6 CARTER, JR., DAVID W. DIXON,
7 ROBERT W. McCOY, JOHN C.
8 SANDHOFER and DEBRA H.
9 WOODWARD,

10 Plaintiffs,

11 v Civil Case No.: 4:11cv45

12 B. J. ROBERTS, Individually
13 and in his official capacity
14 as Sheriff of the City of
15 Hampton, Virginia,

16 Defendant.

17 DEPOSITION UPON ORAL EXAMINATION OF

18 EVA W. BLAND

19 Taken on behalf of the Defendant

20 Newport News, Virginia

21 August 24, 2011

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1 about his management practices?

2 A What information do I have about his
3 management practices?

4 Q That's what it says you know about, so
5 I'm asking you if you know anything other than having
6 worked for him.

7 A Well, I worked for him, but I was not a
8 part of his senior management team, so I wasn't in a
9 position where I sat in on -- in any discussions or
10 decisions about -- you know, about how the agency was
11 to be run.

12 Q Okay. So you don't know about that?

13 A No, I don't.

14 Q Okay. It says as well as defendant's
15 history and practice related to the operation of his
16 political campaigns. Do you know about the history
17 and practice of the operation of his political
18 campaigns?

19 A I was never involved in his political
20 campaigns.

21 Q Okay. All right. In the years you
22 worked for him, did you ever work on his campaigns?
23 Sheriff Roberts' campaigns?

24 A No, I didn't.

25 Q Okay.

1 A I'm -- no.

2 Q All right. Did you ever contribute any
3 money to him?

4 A I purchased tickets for the annual golf
5 tournament.

6 Q Tournament? Okay.

7 A Once, maybe twice.

8 Q Once or twice?

9 A Twice, I think.

10 Q In the years you worked for him?

11 A Yes.

12 Q Did you purchase them voluntarily?

13 A Yes.

14 Q Okay. It also says that you have
15 information related to allegations in the complaint
16 including the sheriff's demands for political loyalty
17 and political support as conditions of employment.

18 Do you know anything about that?

19 A No, I don't have any first-hand
20 knowledge of that.

21 Q Okay. So as a condition of your
22 employment, you were not -- you were not aware of any
23 requirement for political loyalty for continued
24 employment, were you?

25 A No.

1 Q June 2009?

2 A Yes.

3 Q Okay. And I assume that you had no
4 involvement in the sheriff's campaign in 2009?

5 A No, I didn't.

6 Q Did you -- were you involved in
7 Mr. Adams' campaign in 2009?

8 A No.

9 Q Okay. No campaigning whatsoever?

10 A Well, not any individual campaigns. I
11 was a member of the Hampton Democratic Committee but
12 no --

13 Q Okay. All right.

14 A That focus was more on the presidential
15 campaign.

16 Q All right. Did your husband discuss
17 with you the support of whether or not he supported
18 Mr. Adams for sheriff?

19 A No.

20 Q Okay. Did you know whether he was an
21 Adams supporter or not?

22 A No, I don't.

23 Q You didn't know. Okay. All right.

24 A I mean, the voting booth has a -- a
25 shield for a reason.